

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Albert Russo CN 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee	
In re: Albert M. Vono Emma L. Garcia-Reyes Debtor(s)	Case No. 20-23167 / MBK Hearing Date: February 2, 2021 10:00 am Judge: Michael B. Kaplan Chapter: 13

TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

The debtor has failed to file a feasible plan - Debtor's pension loan \$412 ends in month 10.

The debtor has failed to supply the Trustee with the following document(s):

2 months bank statements from Green Dot Bank prior to filing. Listed on Debtor's pay stubs

Amendments to Schedules B and C to add Green Dot Bank \$25 deposited into acct.

The debtor(s) is not paying all disposable income into the plan pursuant to either Schedules I & J or Form 22C based upon the Trustee's review of the income and tax returns provided. The Trustee's calculations are higher for the following reason(s): Income verifies higher, there is disposable income \$1,285.49, which will also verify higher

The Schedules fail to account for the debtor(s) tax refund in the amount of \$6,929 when determining disposable income.

The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4): There is non-exempt equity on real property \$3,084 and bank accounts.

**need November 2020 statements for PNC bank accounts ending in #9757 and #3551.
need domestic support form for debtor, Vono- there are 2 forms need for each of the support obligations
Must file Pre-confirmation certificate.**

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: Mary Krieger, Staff Attorney